

**UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

The Satanic Temple, Inc.

Plaintiff

v.

Newsweek Digital, LLC

Defendant.

1:22-CV-01343-MKV

TST's 30(b)(6) NOTICE OF DEPO-
SITION OF NEWSWEEK DIGITAL,
LLC

To: Defendant and its counsel of record, Cameron Stracher and Sara Tesoriero, 51 Astor Place, 9th Floor, New York, NY 10003.

LET IT BE KNOWN that pursuant to FRCP 26 and 30(b)(6), TST will take the deposition of **Newsweek Digital LLC** through one or more of Defendant's officers, directors, managing agents, or such other persons who consent to testify on its behalf, concerning the matters set forth below. The deposition(s) will take place by oral examination, before a person authorized to administer oaths and take testimony and will be recorded by stenographic and videographic means. The deposition(s) will take place at Reiss Sheppe LLP, 425 Madison Avenue, 19th Floor, New York, New York 10017 on **November 7, 2023**, beginning at **9:30 am EST** and continuing thereafter until complete. A Zoom link with call-

in details will be emailed to Defendant's counsel prior to the deposition.

DEFINITIONS

(1) "TST" is The Satanic Temple, a congregation of atheistic Satanists which began in 2013 and continues to present. TST is the plaintiff in this action.

(2) "Newsweek" is Newsweek Digital LLC, a New York limited liability company whose membership is believed to reside in New York.

(3) "Article" shall mean the Newsweek article published October 29, 2021 entitled "Orgies, Harassment, Fraud: Satanic Temple Rocked by Accusations, Lawsuit" by Julia Duin.

(4) "Article Statement" shall mean the quote in the Article attributed to Jinx Strange, which reads: "Dozens of accounts of sexual abuse being covered up in ways that were more than anecdotal."

MATTERS FOR EXAMINATION

1. The identity of the 30(b)(6) deponent, the scope of their agency for Newsweek, any other relationship they have with Newsweek or its decisionmakers, the grounds for their testimony on any of the following topics, and what investigation or preparation (if any) they have done to speak for Newsweek on

any of the following topics.

2. Any policies, practices, or customs surrounding Newsweek's fact checking procedures, editorial guidelines, corrections to content, media kits, and any other relevant material.

3. Any policies, practices, or customs surrounding Newsweek's selection of article topics for publication.

4. Newsweek's record keeping policies for Slack chat platform.

5. Any policies, practices, or customs surrounding Newsweek's use of Slack.

6. Newsweek's record keeping policies surrounding written communications sent or received by any Newsweek agent, Julia Duin, and any other information source about this case, from January 1, 2021 to present.

7. All communications between Newsweek or any of its subsidiaries and Julia Duin and/or any other third party which relate to any fact, issue, allegation, or any other subject relevant to, the Article Statement.

8. All of Newsweek's internal communications which relate to any fact, issue, allegation, or any other subject relevant to the Article Statement.

9. The internet traffic Newsweek received as a result of the publication of the

subject article, including number of impressions the article received.

10. How Newsweek generates income from its articles in general.

Respectfully submitted on October 30, 2023 by:

By: /s/ Matt Kezhaya

Matt Kezhaya, Ark. # 2014161



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CERTIFICATE AND NOTICE OF SERVICE

NOTICE IS GIVEN that I, Sonia A. Kezhaya, provided the foregoing document by email to opposing counsel at cam@stracherlaw.com and sara@stracherlaw.com on October 30, 2023.

/s/ Sonia A. Kezhaya